

**REMARKS**

**Summary of the Office Action**

Claims 1-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gu et al. (US 6,359,672) in view of Jones et al. (US 6,417,899).

Claims 5-12 and 14-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. (US 6,646,702) in view of Jones et al.

Claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. in view of Jones et al. and Hosonuma et al. (US 4,643,529).

Claim 14 is objected to for a minor informality.

**Summary of the Response to the Office Action**

Applicants have amended claims 1 and 3 to further define the invention, and amend claim 14 to correct a minor grammatical informality. Accordingly, claims 1-17 are pending for consideration.

**Claim Objection**

Claim 14 is objected to for a minor informality. Accordingly, Applicants have amended claim 14 to recite, in part, "...wherein the polarizing film *contacts* the common electrode."

Applicants respectfully assert that use of the term "contacts" is grammatically correct compared to use of the recommended term "contacted." Accordingly, Applicants respectfully request that the objection to claim 14 be withdrawn.

**All Claims Define Allowable Subject Matter**

Claims 1-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gu et al. (US 6,359,672) in view of Jones et al. (US 6,417,899), claims 5-12 and 14-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. (US 6,646,702) in view of Jones et al., and claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. in view of Jones et al. and Hosonuma et al. (US 4,643,529). Applicants respectfully traverse these rejections for the following reasons.

Independent claim 1, as amended, recites a liquid crystal display device including, in part, a polarizing film formed on a passivation film and a pixel electrode formed on at least the polarizing film “wherein the polarizing film and the pixel electrode extend completely over the data line, *and the polarizing film contacts the passivation film,*” (emphasis added). Independent claim 3, as amended, recites a method of fabricating a liquid crystal display device including, in part, forming a polarizing film formed on a passivation film and forming a pixel electrode formed on at least the polarizing film “wherein the polarizing film and the pixel electrode extend completely over the data line, *and the polarizing film contacts the passivation film,*” (emphasis added).”

In contrast to Applicants’ claimed invention, as acknowledged by the Office Action, Gu et al. “lacks disclosure of a polarizing film formed on the passivation film to extend over the data line; and a pixel electrode formed on at least the polarizing film.” Accordingly, the Office Action relies upon Jones et al. for allegedly teaching forming a pixel electrode on at least a polarizing film for the benefit of improving contrast ratios in the display. However, Applicants respectfully assert that the combined teachings of Gu et al. and Jones et al. fails to teach or

suggest that the polarizing layer 53, in FIG. 2 of Jones et al., contacts the insulating layer 33 of Gu et al. Moreover, according to Jones et al., an internal polarizer 17 and a polarizer alignment layer 19 must be provided. Thus, Applicants respectfully assert that the Office Action fails to establish a *prima facie* case of obviousness with regard to at least independent claims 1 and 3, and hence dependent claims 2 and 4.

With regard to the rejection of claims 5-12 and 14-17 under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. (US 6,646,702) in view of Jones et al., the Office Action alleges that the LCD structure of Motomura et al. may be modified by the teachings of Jones et al. “for the benefit of minimizing any adverse effects which may be caused by depolarizing effects of color filters and also reducing parallax.” However, Applicants respectfully assert that modifying the explicit LCD structure of Motomura et al. with the teachings of Jones et al. would result in rendering Motomura et al. inoperable. Specifically, Motomura et al. explicitly requires formation of the retardation, polarizing, and liquid guide plates external to the liquid crystal panel, as well as the semi-transmissive film, in order to increase the intensity of reflected light and to reduce the brightness, thereby ensuring a clear image display in the liquid crystal layer in both the reflective and transmissive display modes. Accordingly, incorporating a polarizing film internal to the liquid crystal panel of Motomura et al., as explicitly taught by Jones et al., would prevent Motomura et al. from achieving these explicit goals. Thus, Applicants respectfully assert that the Office Action fails to establish a *prima facie* case of obviousness with regard to at least independent claims 5, 8, 12, and 15, and hence dependent claims 6, 7, 9-11, 14, 16, and 17.

With regard to the rejection of claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Motomura et al. in view of Jones et al. and Hosonuma et al. (US 4,643,529), Applicants respectfully assert that Hosonuma et al. fails to remedy the deficiencies of the combined teachings of Motomura et al. and Jones et al. Specifically, Applicants respectfully assert that Hosonuma et al. fails to correct the inoperability resulting from the combined teachings of Motomura et al. and Jones et al. Thus, Applicants respectfully assert that the Office Action fails to establish a *prima facie* case of obviousness with regard to at least claim 13.

For at least the above reasons, Applicants respectfully assert that the cited prior art of record fails to establish a *prima facie* case of obviousness with regard to amended independent claims 1 and 3, as well as previously-presented independent claims 5, 8, and 12, and originally-filed independent claim 15. Thus, Applicants respectfully request that the rejections of claims 1-17 under 35 U.S.C. § 103(a) be withdrawn.

### **CONCLUSION**


In view of the foregoing, Applicants respectfully request reconsideration and timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under

37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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